

EXHIBIT 26

CHIA SIU

June 12, 2012

<p>1 C. SIU</p> <p>2 A. Or Frank Chin, I guess.</p> <p>3 Q. Or both of them?</p> <p>4 A. Yeah, I don't know.</p> <p>5 Q. So when you received this offer</p> <p>6 for the third-year analyst position, did you</p> <p>7 talk to anyone about it?</p> <p>8 A. Yes. I talked to Ping about it</p> <p>9 and I also talked to, I believe it was either</p> <p>10 or maybe both, like HR or Brown -- I mean,</p> <p>11 Marty Feinstein who is the head of the analyst</p> <p>12 associate, about like if I needed to sign it</p> <p>13 since I got it after I already became a third</p> <p>14 year, so, it is kind of weird.</p> <p>15 Q. So because it was after July 1st?</p> <p>16 A. Yeah, like I should have received</p> <p>17 this before.</p> <p>18 Q. So let's take those three</p> <p>19 individuals one at a time, who you recall</p> <p>20 speaking with about this. First you said you</p> <p>21 spoke to Ping about this.</p> <p>22 A. Yeah.</p> <p>23 Q. What did you and Ping discuss?</p> <p>24 A. I told her like I'm not sure -- I</p> <p>25 just wanted to let her know that it wasn't</p>	<p>1 C. SIU</p> <p>2 Citigroup for another year?</p> <p>3 A. I told her I wasn't sure if I</p> <p>4 could commit, if the group was going to be</p> <p>5 disbanded, like. Like it wouldn't be -- yeah,</p> <p>6 if the group was going to be disbanded, like I</p> <p>7 don't want to wait around and then for them to</p> <p>8 let me go without a job, when I have like</p> <p>9 calls from recruiters and from other</p> <p>10 competitors. Like I wasn't sure if I should</p> <p>11 return their calls if like Citi wasn't</p> <p>12 committed to me.</p> <p>13 Q. Did you tell Ping that you had</p> <p>14 sent out resumes on your own?</p> <p>15 A. No. That was before this. I</p> <p>16 talked to her after this.</p> <p>17 Q. I understand. So you didn't tell</p> <p>18 her you had sent out resumes?</p> <p>19 A. No.</p> <p>20 Q. Did you tell her that you didn't</p> <p>21 want to sign this agreement because you</p> <p>22 weren't sure you wanted to stay at Citi?</p> <p>23 MR. DATOO: Objection.</p> <p>24 A. I just wanted to let her know that</p> <p>25 it wasn't necessary for me to sign it, and I</p>
<p>1 C. SIU</p> <p>2 necessary for me to sign it in case like she</p> <p>3 would find out later how come I didn't sign</p> <p>4 the offer. So I wanted to let her know that,</p> <p>5 and I was concerned about my, like the future</p> <p>6 of the housing group. And my job security,</p> <p>7 too, like whether management is committed to</p> <p>8 me and the group.</p> <p>9 Q. So you told this to Ping?</p> <p>10 A. Yeah, and -- yeah, and whether I</p> <p>11 should consider other option if the group was</p> <p>12 going to be disbanded since I was getting</p> <p>13 offers, like interviews, or calls from</p> <p>14 recruiter, like I don't know if it would be</p> <p>15 dumb for me, too, like not return their calls.</p> <p>16 Q. And what did Ping say in response?</p> <p>17 A. Like she offered, she suggested</p> <p>18 that if they could secure a promotion for me,</p> <p>19 if Citi would give me a promotion, if that</p> <p>20 would make me feel better, or like secure</p> <p>21 about my position, yeah. And to me I felt</p> <p>22 like it would show a commitment to me and the</p> <p>23 group because they are taking a step.</p> <p>24 Q. Do you recall telling Ping that</p> <p>25 you weren't sure that you wanted to commit to</p>	<p>1 C. SIU</p> <p>2 wasn't sure, like, if the group, the future of</p> <p>3 the group was safe.</p> <p>4 Q. Let me just restate the question.</p> <p>5 Did you tell Ping that you weren't</p> <p>6 sure whether you wanted to sign what's been</p> <p>7 marked as Siu Exhibit 10 because you weren't</p> <p>8 sure you wanted to remain at Citigroup?</p> <p>9 A. Yeah, at that time, given my other</p> <p>10 options.</p> <p>11 Q. And did you tell Marty Feinstein</p> <p>12 the same thing?</p> <p>13 A. No.</p> <p>14 Q. Did you ask Mr. Feinstein about</p> <p>15 this third-year analyst offer?</p> <p>16 A. I don't believe I talked to him</p> <p>17 about this.</p> <p>18 Q. And you said you talked to Mr.</p> <p>19 Brownstein, correct?</p> <p>20 A. I talked to Mr. Brownstein about</p> <p>21 the layoff that happened in June 2008.</p> <p>22 Q. I'm sorry, this could be, maybe I</p> <p>23 misunderstood. I thought you had said earlier</p> <p>24 that you spoke to Ping about this offer?</p> <p>25 A. Yes. Like at the end of July.</p>



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<p>153</p> <p>1 C. SIU</p> <p>2 Q. And I thought you said you also</p> <p>3 spoke to Mr. Feinstein and Mr. Brownstein</p> <p>4 about this offer.</p> <p>5 A. No.</p> <p>6 Q. So other than Ping, did you talk</p> <p>7 to anybody else about this offer, what's been</p> <p>8 marked as Exhibit 10?</p> <p>9 A. I think Ping talked to Amy and</p> <p>10 then Amy followed up with me about my</p> <p>11 conversation with Ping that day.</p> <p>12 Q. And so what did Ms. Bartoletti say</p> <p>13 and what did you say in that conversation?</p> <p>14 A. Basically restating my concern</p> <p>15 about my, the future of the group and whether</p> <p>16 my job is safe, and that if getting a</p> <p>17 promotion would make me feel better and more</p> <p>18 secure -- and secure about my position.</p> <p>19 Q. Well, you had received an offer to</p> <p>20 stay as a third-year analyst, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And did that give you any comfort</p> <p>23 that your job was safe?</p> <p>24 A. It just gave me a little bit. It</p> <p>25 is more like the norm, but by giving me the</p>	<p>155</p> <p>1 C. SIU</p> <p>2 Bartoletti, did you talk to anybody else about</p> <p>3 this offer?</p> <p>4 A. Like, I don't remember. I might</p> <p>5 have talked to Koessel because he was the head</p> <p>6 of the -- co-head of the group. So Amy might</p> <p>7 have mentioned something to him.</p> <p>8 Q. And what do you remember talking</p> <p>9 to Koessel about?</p> <p>10 A. Like similar things, like my</p> <p>11 concern and getting the promotion would show,</p> <p>12 like signal to me that the firm is committed</p> <p>13 to me and the group.</p> <p>14 Q. Did you tell anybody that if you</p> <p>15 were not offered a promotion, you would leave?</p> <p>16 A. No.</p> <p>17 Q. Did you tell Ms. Bartoletti that</p> <p>18 you were thinking of leaving?</p> <p>19 A. I never thought of leaving.</p> <p>20 Q. Did you tell Mr. Koessel that you</p> <p>21 were thinking of leaving?</p> <p>22 A. No.</p> <p>23 Q. Let me show you an e-mail exchange</p> <p>24 on July 24th and 25th, Bates stamped CGMI BART</p> <p>25 012477 and 012478.</p>
<p>154</p> <p>1 C. SIU</p> <p>2 promotion, it is actually taking an active</p> <p>3 step to show their commitment to me. First --</p> <p>4 ever since this is more like a passive action.</p> <p>5 Q. So you had that, you conveyed that</p> <p>6 to Ms. Bartoletti, what you just testified,</p> <p>7 what you testified to a minute ago.</p> <p>8 And what did Ms. Bartoletti say in</p> <p>9 response?</p> <p>10 A. That she will work with management</p> <p>11 to get me my -- to get a promotion for me.</p> <p>12 Q. But you had spoken to her earlier</p> <p>13 about the possible promotion, correct?</p> <p>14 A. Earlier?</p> <p>15 Q. Before you received this --</p> <p>16 A. Yeah, I think, yeah, I think --</p> <p>17 MR. DATOO: Let --</p> <p>18 Q. Before you received this offer?</p> <p>19 A. Yes. I think it was like after</p> <p>20 the June layoff she, I guess -- or like my</p> <p>21 spirit was pretty down after Nick was gone,</p> <p>22 she tried to tell me that they tried to get a</p> <p>23 promotion for me.</p> <p>24 Q. So other than Ping and that</p> <p>25 discussion you just referred to with Ms.</p>	<p>156</p> <p>1 C. SIU</p> <p>2 MR. TURNBULL: I'll have this</p> <p>3 marked as Siu 11.</p> <p>4 (Siu Exhibit 11, e-mail</p> <p>5 exchange on July 24th and 25th,</p> <p>6 Bates stamped CGMI BART 012477-478</p> <p>7 marked for identification, as of</p> <p>8 this date.)</p> <p>9 Q. Ms. Siu, I want to direct your</p> <p>10 attention to the second page of the e-mail.</p> <p>11 A. Um-hum.</p> <p>12 Q. And there is an e-mail from Ping</p> <p>13 to Amy Bartoletti on July 24. Do you see</p> <p>14 that?</p> <p>15 A. Yes.</p> <p>16 Q. And Ping says: "Amy, I just had a</p> <p>17 very lengthy conversation with Chia. There's</p> <p>18 a chance we may lose her. She was given a</p> <p>19 contract to stay for another year as an</p> <p>20 analyst and she is not sure if she wants to</p> <p>21 sign it."</p> <p>22 Did you tell Ping that you weren't</p> <p>23 sure if you wanted to sign that contract?</p> <p>24 MR. DATOO: Objection.</p> <p>25 A. Yeah, I told her I wasn't sure</p>



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<p>1 C. SIU</p> <p>2 an associate level. So it would make sense</p> <p>3 for me to have that.</p> <p>4 Q. Did anyone, did Mr. Koessel or</p> <p>5 Ping tell you they would support promoting</p> <p>6 you?</p> <p>7 A. Based on our conversation it was</p> <p>8 the impression that I got. Maybe they didn't</p> <p>9 use the word support promotion, but after my,</p> <p>10 the end of my conversation with Ping she asked</p> <p>11 if getting a promotion would make me feel like</p> <p>12 better and secure at Citi. I told her yes.</p> <p>13 And then she talked to Amy and</p> <p>14 then Amy followed up with me.</p> <p>15 So I don't see why she wouldn't</p> <p>16 support me. And the same with Koessel because</p> <p>17 he was pretty satisfied with my performance</p> <p>18 and that I was already performing above an</p> <p>19 analyst level.</p> <p>20 And it is not -- and they do</p> <p>21 promote people after two years. Like the year</p> <p>22 before me, they promoted a guy after two</p> <p>23 years, so.</p> <p>24 Q. And who --</p> <p>25 A. I don't see why they wouldn't make</p>	<p>1 C. SIU</p> <p>2 internship?</p> <p>3 A. Yes, yes. Like I participated --</p> <p>4 I pretty much did the same thing as analyst,</p> <p>5 it was just a title of internist instead of</p> <p>6 analyst. So I felt like I have as much</p> <p>7 experience as he did, but he was promoted</p> <p>8 after two years, so. I don't see why they</p> <p>9 couldn't promote me, especially I did have</p> <p>10 another year of experience.</p> <p>11 Q. Other than this gentleman and</p> <p>12 Sara, do you know of any other analysts who</p> <p>13 were promoted in public finance after two</p> <p>14 years?</p> <p>15 A. I don't know, because like he was</p> <p>16 in my training class so that was the only one</p> <p>17 I remember, but -- and I didn't attend the</p> <p>18 training class in 2006 because I already</p> <p>19 attended one in 2005.</p> <p>20 Q. So other than those two, you are</p> <p>21 not aware of any other analyst being promoted</p> <p>22 after two years?</p> <p>23 A. Yeah. I mean, I didn't ask.</p> <p>24 Q. Did you talk to Mr. Feinstein</p> <p>25 about a promotion?</p>
<p>1 C. SIU</p> <p>2 an exception for me, especially since I have</p> <p>3 an additional year of experience like when I</p> <p>4 interned there for a whole year.</p> <p>5 Q. Well, you interned at Citigroup</p> <p>6 for half a year?</p> <p>7 A. Half a year and half a year at the</p> <p>8 New York State Housing agency which is</p> <p>9 relevant because that's one of our client. So</p> <p>10 I got, you know, experience at both sides.</p> <p>11 Q. And who was the analyst who was</p> <p>12 promoted earlier, or promoted after two years</p> <p>13 in 2007?</p> <p>14 A. He -- I think his name is Joe</p> <p>15 Drumm, Jerome Drumm.</p> <p>16 Q. Drumm?</p> <p>17 A. Gerard Drumm.</p> <p>18 Q. D-R-U-M?</p> <p>19 A. Yeah, something like that, yeah.</p> <p>20 Q. And he was an analyst in public</p> <p>21 finance?</p> <p>22 A. Yeah, he joined I believe like</p> <p>23 July of 2005. We were actually in the same</p> <p>24 training class.</p> <p>25 Q. You were training for the</p>	<p>1 C. SIU</p> <p>2 A. I don't remember talking to him</p> <p>3 about.</p> <p>4 Q. Did you ask anyone about what it</p> <p>5 would mean if you were promoted?</p> <p>6 A. I tried to ask Amy like what is,</p> <p>7 like in terms of compensation if I would get</p> <p>8 like a sign-on bonus or, like, basically the</p> <p>9 details of compensation because I, my job</p> <p>10 responsibility is pretty much similar since I</p> <p>11 was already performing it.</p> <p>12 Q. And what did Ms. Bartoletti say in</p> <p>13 response to your question?</p> <p>14 A. She -- I think she tried to reach</p> <p>15 out to management, either Brownstein or Chin</p> <p>16 and they tried to find out about it and I</p> <p>17 think at that time they didn't know because HR</p> <p>18 still hasn't -- like decided on the numbers</p> <p>19 yet or they haven't determined the number.</p> <p>20 They didn't -- yeah.</p> <p>21 Q. So was it your impression as you</p> <p>22 were having these discussions with your</p> <p>23 colleagues in the housing group, including the</p> <p>24 co-head of public finance, David Brownstein,</p> <p>25 in June and July of 2008, was it your</p>



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<p>1 C. SIU</p> <p>2 impression that everyone wanted you to stay?</p> <p>3 A. After my conversation in July,</p> <p>4 yeah, like by giving me an offer as an</p> <p>5 associate.</p> <p>6 Q. I mean, certainly if they wanted</p> <p>7 you to leave, they could have just let you</p> <p>8 leave, right?</p> <p>9 A. Yeah.</p> <p>10 Q. They could have said, look, we're</p> <p>11 not going to give you a promotion early,</p> <p>12 right?</p> <p>13 A. Yes.</p> <p>14 Q. And David Brownstein didn't have</p> <p>15 to become involved in trying to get an</p> <p>16 approval for you a half year early for a</p> <p>17 promotion, right?</p> <p>18 MR. DATOO: Objection.</p> <p>19 A. Yeah, if he was the one involved.</p> <p>20 Q. And do you think you were misled</p> <p>21 about the promotion?</p> <p>22 A. What do you mean?</p> <p>23 Q. Do you think, at the time you were</p> <p>24 informed by Ms. Bartoletti that the public</p> <p>25 finance group intended to promote you, either</p>	<p>1 C. SIU</p> <p>2 eventually I found out like probably on line</p> <p>3 or something.</p> <p>4 Q. And what would your compensation</p> <p>5 have been had you become an associate?</p> <p>6 A. I think it was like around 90</p> <p>7 something.</p> <p>8 Q. Base salary?</p> <p>9 A. Yeah.</p> <p>10 Q. And then you would have been</p> <p>11 eligible for a discretionary bonus?</p> <p>12 A. Yes. And a sign-on bonus, too.</p> <p>13 Q. I'm sorry, and a sign-on bonus?</p> <p>14 A. Yeah.</p> <p>15 Q. What do you mean by that?</p> <p>16 A. I think that's like a stub for</p> <p>17 half the year I work as an analyst from June</p> <p>18 to December.</p> <p>19 Q. And who told you you would be</p> <p>20 eligible for a sign-on or a stub bonus?</p> <p>21 A. It was general knowledge that</p> <p>22 people usually get a stub for that year, for</p> <p>23 July to December.</p> <p>24 Q. So no one told you that?</p> <p>25 A. Yeah. It was like general, like</p>
<p>1 C. SIU</p> <p>2 at the end of '08 or the beginning of '09, do</p> <p>3 you think she was being honest with you?</p> <p>4 A. I thought she was honest with me,</p> <p>5 yeah.</p> <p>6 Q. And do you think the housing group</p> <p>7 and public finance intended to promote you</p> <p>8 when they told you they were?</p> <p>9 A. That was my impression at that</p> <p>10 time that they intended to.</p> <p>11 Q. And of course you never got that</p> <p>12 promotion, correct?</p> <p>13 MR. DATOO: Objection.</p> <p>14 A. The actual offer letter?</p> <p>15 Q. The actual -- you never became an</p> <p>16 associate, correct?</p> <p>17 A. Yeah, because I got terminated</p> <p>18 before January, that's when I was about to,</p> <p>19 like, become or like with that title,</p> <p>20 associate.</p> <p>21 Q. And you mentioned earlier that you</p> <p>22 had asked questions about compensation. Did</p> <p>23 anyone tell you what your compensation would</p> <p>24 be upon promotion to associate?</p> <p>25 A. I don't remember, but I think</p>	<p>1 C. SIU</p> <p>2 knowledge, like, yeah.</p> <p>3 Q. But no one told you that?</p> <p>4 A. Yeah, specifically -- yeah. Well,</p> <p>5 I did ask Amy what it would be, and then she</p> <p>6 asked, I think she asked Brownstein or Chin,</p> <p>7 and then he asked HR. And I think they said</p> <p>8 that they haven't figured it out because it's</p> <p>9 an unusual case. Like for me to be promoted</p> <p>10 around that time, August.</p> <p>11 Q. At year end, you mean?</p> <p>12 A. Around August, yeah.</p> <p>13 Q. Well, the promotion wasn't going</p> <p>14 to be effective in August, correct?</p> <p>15 A. Yeah, yeah.</p> <p>16 Q. It was going to be effective at</p> <p>17 the end of the year?</p> <p>18 A. Yes, yes, so I guess it is too</p> <p>19 early to tell, maybe.</p> <p>20 Q. Did anyone tell you they have to</p> <p>21 wait to see what happens for the rest of the</p> <p>22 year with the firm and it's performance?</p> <p>23 MR. DATOO: Objection.</p> <p>24 A. I don't remember.</p> <p>25 Q. What was your base salary in 2008</p>



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<p>1 C. SIU</p> <p>2 as a third-year analyst?</p> <p>3 A. Third year, 80.</p> <p>4 Q. \$80,000?</p> <p>5 A. Yeah.</p> <p>6 MR. TURNBULL: It is probably a</p> <p>7 good time for a break.</p> <p>8 MR. DATOO: Sure. Lunch?</p> <p>9 MR. TURNBULL: Lunch.</p> <p>10 MR. DATOO: Back at 2?</p> <p>11 THE VIDEOGRAPHER: The time now is</p> <p>12 1:20 p.m. Going off the record.</p> <p>13 (Lunch recess: 1:20 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 C. SIU</p> <p>2 Q. And then this, what's been marked</p> <p>3 as Siu Exhibit 12 is an e-mail you see from</p> <p>4 Martin Feinstein to Amy Bartoletti, Mike</p> <p>5 Koessel, Frank Chin and David Brownstein. Do</p> <p>6 you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And on the top it looks like it is</p> <p>9 a follow-on e-mail, he says:</p> <p>10 "I forgot to mention Chia also</p> <p>11 asked about the bonus number and then last</p> <p>12 year I talked her through that issue."</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And that, you testified about you</p> <p>16 questioned why your bonus was lower and he</p> <p>17 explained why. Right?</p> <p>18 A. Yes.</p> <p>19 Q. And then below that he lists six</p> <p>20 things summarizing your thoughts based upon a</p> <p>21 conversation he had with you. Do you see</p> <p>22 that?</p> <p>23 A. Yes, I see his summary.</p> <p>24 Q. And so he lists six different</p> <p>25 points, the first of which is:</p>
<p>1 C. SIU</p> <p>2 AFTERNOON SESSION</p> <p>3 2:12 p.m.</p> <p>4 THE VIDEOGRAPHER: The time now is</p> <p>5 2:12 p.m. We're back on the record.</p> <p>6 CHIA SIU,</p> <p>7 having been previously duly sworn, was</p> <p>8 examined and testified further as</p> <p>9 follows:</p> <p>10 MR. TURNBULL: I'm going to have</p> <p>11 marked as Siu Exhibit 12, a one-page</p> <p>12 document that has an e-mail from Martin</p> <p>13 Feinstein on June 27, 2008.</p> <p>14 (Siu Exhibit 12, one-page</p> <p>15 document with e-mail from Martin</p> <p>16 Feinstein, June 27, 2008 marked for</p> <p>17 identification, as of this date.)</p> <p>18 CONTINUED EXAMINATION</p> <p>19 BY MR. TURNBULL:</p> <p>20 Q. Ms. Siu, you testified earlier</p> <p>21 that after the layoff of Nick Fluehr, that you</p> <p>22 had a discussion with a number of people,</p> <p>23 including Martin Feinstein about the</p> <p>24 department. Do you recall that?</p> <p>25 A. Yes, after the layoff.</p>	<p>1 C. SIU</p> <p>2 "How could a small group lose two</p> <p>3 professionals. Bigger groups would have felt</p> <p>4 the pain less."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Did you talk to Mr. Feinstein</p> <p>8 about that, about why your group had lost two?</p> <p>9 A. Yes. Because we were</p> <p>10 short-staffed already.</p> <p>11 Q. So you thought even before the</p> <p>12 layoffs you were short-staffed?</p> <p>13 A. Yes.</p> <p>14 Q. And that the group was, in your</p> <p>15 view was the group too small even before the</p> <p>16 layoffs?</p> <p>17 A. Yes.</p> <p>18 Q. And so you asked how could we lose</p> <p>19 two more?</p> <p>20 A. Yes.</p> <p>21 Q. And what did he respond?</p> <p>22 A. I think -- I believe he said that</p> <p>23 it was for cost savings, like cost-saving</p> <p>24 measure, cost-cutting saving measure.</p> <p>25 Q. And why did you believe even</p>



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<p>173</p> <p>1 C. SIU</p> <p>2 before the layoffs that the group was too</p> <p>3 small?</p> <p>4 A. Because when I joined the housing</p> <p>5 group, a normal size was, I believe like close</p> <p>6 to ten, and we already lost people since the</p> <p>7 beginning of the year.</p> <p>8 Q. In the earlier layoff?</p> <p>9 A. Yeah, like when I -- yeah, and we,</p> <p>10 like our deal floor was pretty consistent and</p> <p>11 growing.</p> <p>12 Q. I just want to make sure I heard</p> <p>13 you correctly. You said normal size. Did you</p> <p>14 say our normal size was ten, or did you say a</p> <p>15 normal size is ten?</p> <p>16 A. Like, when I joined the group, I</p> <p>17 think the housing group usually, when I first</p> <p>18 joined or when I interned there it was around</p> <p>19 five -- I mean, ten people, around.</p> <p>20 Q. Understood.</p> <p>21 A. It was much bigger. And we lost a</p> <p>22 few people since the beginning of the year.</p> <p>23 Q. Right. Including this layoff in</p> <p>24 June of 2008, it would have been at least four</p> <p>25 people that you lost, right?</p>	<p>175</p> <p>1 C. SIU</p> <p>2 associate or an -- and an analyst.</p> <p>3 Q. Do you know what the size of the</p> <p>4 housing groups at your competitors were?</p> <p>5 A. I don't really know.</p> <p>6 Q. And in No. 3, Mr. Feinstein says:</p> <p>7 How are they, how was your group and a fine</p> <p>8 time to train the new staff when the group is</p> <p>9 this busy.</p> <p>10 Did you discuss that with Mr.</p> <p>11 Feinstein?</p> <p>12 A. I believe so.</p> <p>13 Q. Do you recall what he said on that</p> <p>14 point?</p> <p>15 A. I don't I believe he comment. We</p> <p>16 just had to allocate time to train them.</p> <p>17 Q. And then 4 talks about Nick.</p> <p>18 That's Nick Fleuhr, right?</p> <p>19 A. Yes.</p> <p>20 Q. And you raised the issue about how</p> <p>21 are we going to keep accounts?</p> <p>22 A. Um-hum.</p> <p>23 Q. I'm sorry, if you could say yes or</p> <p>24 no.</p> <p>25 A. Yes.</p>
<p>174</p> <p>1 C. SIU</p> <p>2 A. Yes.</p> <p>3 Q. So it would have brought you down</p> <p>4 to six or so?</p> <p>5 A. Yeah. I forgot how many people</p> <p>6 were left. Yeah, it was like Tian and me</p> <p>7 and....</p> <p>8 Q. And then two, Mr. Feinstein says:</p> <p>9 "Adding one associate and one</p> <p>10 analyst still puts us below their original</p> <p>11 staffing."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. So is that what you were referring</p> <p>15 to, that even if you add an associate and an</p> <p>16 analyst, we're still below ten?</p> <p>17 A. Yes.</p> <p>18 MR. DATOO: Chia, let him finish</p> <p>19 the question.</p> <p>20 THE WITNESS: Sorry.</p> <p>21 Q. And did you and Mr. Feinstein talk</p> <p>22 about possibly adding an associate and an</p> <p>23 analyst?</p> <p>24 A. I don't remember, but I believe he</p> <p>25 said that our group is expected to get an</p>	<p>176</p> <p>1 C. SIU</p> <p>2 Q. And what did Mr. Feinstein say</p> <p>3 about that point?</p> <p>4 A. I don't really remember if it was</p> <p>5 him or Brownstein saying that Amy and Koessel</p> <p>6 could take over his account, like continue the</p> <p>7 coverage.</p> <p>8 Q. And keep the accounts?</p> <p>9 A. Yes, maintain the account.</p> <p>10 Q. And then I think you testified</p> <p>11 about this UBS going out of business earlier,</p> <p>12 but do you recall discussing with Mr.</p> <p>13 Feinstein the fact that UBS had gone out of</p> <p>14 business?</p> <p>15 A. Yes, it was general market</p> <p>16 knowledge that they closed down their public</p> <p>17 finance department and it would have been a</p> <p>18 great opportunity for the housing group to get</p> <p>19 accounts because UBS was senior manager for a</p> <p>20 lot of major accounts so.</p> <p>21 Q. Did Mr. Feinstein say he thought</p> <p>22 the group, even without Nick, could get those</p> <p>23 accounts?</p> <p>24 A. I don't remember, but, probably</p> <p>25 yes. I don't see why not.</p>



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CHIA SIU

June 12, 2012

<p>1 C. SIU</p> <p>2 Q. And then his last point that he</p> <p>3 writes about his conversation with you is, you</p> <p>4 and he discussed what the group dynamics in</p> <p>5 the future were going to be.</p> <p>6 Do you recall discussing that with</p> <p>7 Mr. Feinstein?</p> <p>8 A. Yeah, I believe we discussed the,</p> <p>9 like, my concern about the group, whether the</p> <p>10 company is committed to the housing group.</p> <p>11 Q. Were you concerned that by</p> <p>12 shrinking the size of the group, the company</p> <p>13 was showing that they were not committed to</p> <p>14 the housing business?</p> <p>15 A. Yeah, it was showing, especially</p> <p>16 given that the head of the housing group was</p> <p>17 let go.</p> <p>18 Q. When were you told that your</p> <p>19 employment would end?</p> <p>20 A. Excuse me?</p> <p>21 Q. When were you informed that you</p> <p>22 were going to be let go?</p> <p>23 A. In November.</p> <p>24 Q. Of 2008?</p> <p>25 A. Yes.</p>	<p>177</p> <p>1 C. SIU</p> <p>2 Q. And what did each of them say to</p> <p>3 you?</p> <p>4 A. Something along the line that they</p> <p>5 are shocked, and if you need help let them</p> <p>6 know, something like that. I was like really,</p> <p>7 like in shock that day.</p> <p>8 Q. Let me go back to the meeting that</p> <p>9 you had. You said it was with someone from</p> <p>10 human resources, correct, the person who told</p> <p>11 you you were being terminated?</p> <p>12 A. That day. That day, yes.</p> <p>13 Q. And you can't remember that</p> <p>14 person's name?</p> <p>15 A. No.</p> <p>16 Q. Do you remember whether that</p> <p>17 person was a male or a female?</p> <p>18 A. I believe she was a female.</p> <p>19 Q. And was this a face-to-face</p> <p>20 discussion?</p> <p>21 A. Yes.</p> <p>22 Q. Where did that take place?</p> <p>23 A. In one of the offices at Citi.</p> <p>24 Q. On your floor?</p> <p>25 A. Yes.</p>
<p>178</p> <p>1 C. SIU</p> <p>2 Q. And who told you?</p> <p>3 A. It was someone from, I think she</p> <p>4 works for HR department. I forgot her name.</p> <p>5 Q. Did anyone else from the group</p> <p>6 meet with you, from the housing group?</p> <p>7 A. Not -- no.</p> <p>8 Q. How about anyone from public</p> <p>9 finance?</p> <p>10 A. No, they didn't meet with me.</p> <p>11 They just say, like -- they were kind of</p> <p>12 shocked that I was selected and, you know,</p> <p>13 like wished me luck.</p> <p>14 Q. When you say they were shocked,</p> <p>15 who are you referring to?</p> <p>16 A. The people in my group.</p> <p>17 Q. So can you be specific.</p> <p>18 A. Yes.</p> <p>19 Q. Who did you talk to about your</p> <p>20 termination?</p> <p>21 A. After I was notified about the</p> <p>22 termination?</p> <p>23 Q. Yes.</p> <p>24 A. I believe Amy, like Ping, Ping</p> <p>25 Hsieh, Koessel, Raymond I guess, Raymond High.</p>	<p>180</p> <p>1 C. SIU</p> <p>2 Q. What did the woman from HR say to</p> <p>3 you in this meeting?</p> <p>4 A. I don't really remember. It is</p> <p>5 such a long time ago. She basically hand me</p> <p>6 papers telling me to pack up my stuff and that</p> <p>7 I was no longer needed, so.</p> <p>8 Q. Did she tell you why you were</p> <p>9 being let go?</p> <p>10 A. I think like reduction in force.</p> <p>11 Q. Did she say anything else about</p> <p>12 why you were being let go?</p> <p>13 A. No, I don't remember.</p> <p>14 Q. Did you ask her any questions in</p> <p>15 this meeting?</p> <p>16 A. I don't believe -- I don't</p> <p>17 remember. I don't believe I did. I was just</p> <p>18 shocked.</p> <p>19 Q. Do you know whether anyone else</p> <p>20 from the housing group was let go in that</p> <p>21 November reduction?</p> <p>22 A. Ping Hsieh was let go and Amy</p> <p>23 Bartoletti and Mike Murad I think his last</p> <p>24 name.</p> <p>25 Q. He was the individual that was</p>



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<p>189</p> <p>1 C. SIU</p> <p>2 decided to let Henry go which didn't make</p> <p>3 sense when we were already short-staffed, so.</p> <p>4 Q. Well, you said that at least when</p> <p>5 you raised questions about some of the earlier</p> <p>6 reductions, that you were told it was for</p> <p>7 cost-savings reasons, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And do you know whether this</p> <p>10 November round of layoffs was also for</p> <p>11 cost-saving reasons?</p> <p>12 A. I think that's what I was told.</p> <p>13 Q. Up until November of 2008, did you</p> <p>14 think anyone from the public finance group who</p> <p>15 had been terminated in 2008, was terminated</p> <p>16 based on their gender?</p> <p>17 MR. DATOO: Are you saying the</p> <p>18 whole public finance department? Okay.</p> <p>19 MR. TURNBULL: Yes.</p> <p>20 A. Like all the layoffs.</p> <p>21 Q. Up until November 2008?</p> <p>22 A. All the layoffs.</p> <p>23 Q. So we had a --</p> <p>24 A. January.</p> <p>25 Q. January. We had a March and we</p>	<p>191</p> <p>1 C. SIU</p> <p>2 Q. Where did you see any articles on</p> <p>3 that topic?</p> <p>4 A. Like online or something.</p> <p>5 Q. And do you recall any of the</p> <p>6 publications that they appeared in?</p> <p>7 A. I don't remember.</p> <p>8 Q. Did you print any of those out?</p> <p>9 A. No.</p> <p>10 Q. Any other basis for your belief</p> <p>11 that one reason you might be terminated was</p> <p>12 because of your gender?</p> <p>13 A. No.</p> <p>14 Q. Now, you had earlier raised</p> <p>15 concerns about staying with Citigroup,</p> <p>16 correct?</p> <p>17 A. Yeah, about my, the future of the</p> <p>18 group and my job security, whether they would</p> <p>19 let me go.</p> <p>20 Q. And you had raised concerns about</p> <p>21 the size of the group?</p> <p>22 A. Yes.</p> <p>23 Q. And the group shrinking was a</p> <p>24 concern of yours?</p> <p>25 A. Yeah, because it shows that the</p>
<p>190</p> <p>1 C. SIU</p> <p>2 had a June.</p> <p>3 A. Okay. I didn't see that in my</p> <p>4 group.</p> <p>5 Q. And did you see that anywhere</p> <p>6 across public finance where gender played a</p> <p>7 role in a termination decision?</p> <p>8 A. Not prior to November 2008.</p> <p>9 Q. And when you said to your roommate</p> <p>10 "you might need to support me," did you think</p> <p>11 at that point that you might be terminated</p> <p>12 because of your gender?</p> <p>13 A. It could be one of the reasons,</p> <p>14 yeah. It's one of the reasons.</p> <p>15 Q. And what's the basis for that</p> <p>16 belief?</p> <p>17 A. Because I guess I read articles</p> <p>18 that people sometimes use a mass layoff to</p> <p>19 mask gender discrimination. So it's less</p> <p>20 hidden -- I mean, it's hidden.</p> <p>21 Q. So you had read articles about</p> <p>22 that prior to your layoff?</p> <p>23 A. I've seen it, yeah.</p> <p>24 Q. Before your layoff?</p> <p>25 A. Yeah.</p>	<p>192</p> <p>1 C. SIU</p> <p>2 management is not committed, it looks like</p> <p>3 they are trying to eliminate the group.</p> <p>4 Q. And there was concern among people</p> <p>5 within your group that you might leave after</p> <p>6 the June layoffs, correct?</p> <p>7 MR. DATOO: Objection.</p> <p>8 A. I guess, I don't know if they got</p> <p>9 that impression based on my conversation</p> <p>10 because I got other calls from recruiters and</p> <p>11 other companies, so I just want to make sure</p> <p>12 that my position at Citi is secure and that I</p> <p>13 felt secure, like not reaching out back to</p> <p>14 them.</p> <p>15 Q. But you were aware that at least</p> <p>16 the others in your group -- Ping, Amy, Mike</p> <p>17 Koessel, David Brownstein -- that they were</p> <p>18 concerned after the June layoffs that you</p> <p>19 might leave?</p> <p>20 MR. DATOO: Objection.</p> <p>21 Q. You can answer.</p> <p>22 A. It might have occurred to them,</p> <p>23 but they gave me the promotion as a way to</p> <p>24 show me that they are committed, so it kind of</p> <p>25 alleviated my concern.</p>



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<p style="text-align: right;">193</p> <p>1 C. SIU</p> <p>2 Q. And, in fact, Ping communicated to</p> <p>3 Ms. Bartoletti that you might leave after you</p> <p>4 and she met, right?</p> <p>5 A. I guess that's the impression</p> <p>6 that -- from our conversation.</p> <p>7 Q. Right. And so she communicated</p> <p>8 that, correct?</p> <p>9 A. Yeah, I guess she communicated to</p> <p>10 Amy.</p> <p>11 Q. And that was communicated to</p> <p>12 others in the group as well, right?</p> <p>13 A. Koessel I believe.</p> <p>14 Q. And Brownstein as well?</p> <p>15 A. Yes, I believe so.</p> <p>16 Q. And do you know whether anybody</p> <p>17 within the group in November of 2008 would</p> <p>18 think that if we did additional layoffs and</p> <p>19 you remained, that you might leave?</p> <p>20 MR. DATOO: Objection.</p> <p>21 A. No, I never raised any more</p> <p>22 concern after, after they gave me the</p> <p>23 promotion.</p> <p>24 Q. Do you know whether David</p> <p>25 Brownstein had a concern that if he kept you</p>	<p style="text-align: right;">195</p> <p>1 C. SIU</p> <p>2 necessary to sign that letter?</p> <p>3 A. Yes.</p> <p>4 Q. And that's why you didn't sign it?</p> <p>5 A. Yes. And the other reason is that</p> <p>6 they were working on the associate offer.</p> <p>7 Q. And you know that, or at least you</p> <p>8 testified that one of the reasons they offered</p> <p>9 you that promotion was to try to convince you</p> <p>10 to stay, correct?</p> <p>11 MR. DATOO: Objection.</p> <p>12 A. Yes, to address my concern to feel</p> <p>13 comfortable giving up other opportunities.</p> <p>14 Q. Do you think, do you know whether</p> <p>15 anyone was concerned that if the group had</p> <p>16 shrunk to three people, and you were one of</p> <p>17 the three, that you might leave because you</p> <p>18 thought the group was too small?</p> <p>19 MR. DATOO: Objection.</p> <p>20 Q. You can answer.</p> <p>21 A. It never occurred to me that that</p> <p>22 would be an issue.</p> <p>23 Q. Do you think that would be a</p> <p>24 reasonable concern that someone might have --</p> <p>25 MR. DATOO: Objection.</p>
<p style="text-align: right;">194</p> <p>1 C. SIU</p> <p>2 and laid off others in November of 2008 that</p> <p>3 you might leave?</p> <p>4 MR. DATOO: Objection.</p> <p>5 Q. You can answer.</p> <p>6 A. I wasn't aware. If I knew, I</p> <p>7 would have, like, told him that I wouldn't,</p> <p>8 because I'm committed to my words. Like, if</p> <p>9 I'm going to take this offer, I'm going to</p> <p>10 stay until the end of the term, yeah.</p> <p>11 Q. Well, you never signed the</p> <p>12 contract, the offer to be a third-year</p> <p>13 analyst, right?</p> <p>14 A. Yes, because they were working on</p> <p>15 the analyst position offer.</p> <p>16 Q. You mean the associate?</p> <p>17 A. Yes, I'm sorry, the associate.</p> <p>18 Q. So you never signed the analyst</p> <p>19 offer letter, correct?</p> <p>20 A. Yes, because they say it's not</p> <p>21 necessary and that --</p> <p>22 Q. Who said that?</p> <p>23 A. I believe it was either Marty</p> <p>24 Feinstein or HR.</p> <p>25 Q. So somebody told you it was not</p>	<p style="text-align: right;">196</p> <p>1 C. SIU</p> <p>2 Q. -- given your prior expressions</p> <p>3 and concerns about the size of the group?</p> <p>4 MR. DATOO: Objection.</p> <p>5 A. What was the first half, if</p> <p>6 someone would get --</p> <p>7 Q. That it would be reasonable for</p> <p>8 someone to think that if the group shrunk to</p> <p>9 three, from seven to three, and you were one</p> <p>10 of the three, that you might leave?</p> <p>11 MR. DATOO: Objection.</p> <p>12 A. Well, I don't know how other</p> <p>13 people think, but that could be a reason. But</p> <p>14 like based on my performance, I'm more</p> <p>15 efficient than the rest. So if anything, they</p> <p>16 should have retained me because I could do</p> <p>17 things, accomplish more in a shorter time</p> <p>18 frame.</p> <p>19 Q. Well, when you say you are more</p> <p>20 efficient than the rest, there was only one</p> <p>21 other analyst, right?</p> <p>22 A. Yes.</p> <p>23 Q. And that was Tian?</p> <p>24 A. Yes.</p> <p>25 Q. When you say you are more</p>



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<p>205</p> <p>1 C. SIU</p> <p>2 A. I can't really think of any other</p> <p>3 reasons. Because my performance review is</p> <p>4 superior.</p> <p>5 Q. And, again, you don't know whether</p> <p>6 his was superior?</p> <p>7 A. Yeah, I don't know, but -- well,</p> <p>8 first of all, it is impossible to be superior</p> <p>9 and I completed more deals, I ran more</p> <p>10 transactions than he did.</p> <p>11 Q. Is an individual in the group</p> <p>12 evaluated solely on the number of transactions</p> <p>13 they complete, or are there other bases for</p> <p>14 evaluation?</p> <p>15 A. It is sort of an indication that</p> <p>16 if they assign you to more accounts, that they</p> <p>17 are more comfortable with that person running</p> <p>18 the account.</p> <p>19 Q. And you said earlier that Mr. High</p> <p>20 was not assigned to any student loans, right?</p> <p>21 A. He was assigned to student loans.</p> <p>22 Q. I'm sorry. Mr. Koessel was not,</p> <p>23 right?</p> <p>24 A. Yes.</p> <p>25 Q. So it was yourself, Ms.</p>	<p>207</p> <p>1 C. SIU</p> <p>2 A. I don't remember. It is like</p> <p>3 probably -- I don't, like, between maybe</p> <p>4 around September, October. I don't know.</p> <p>5 Around that time frame. Before the layoff.</p> <p>6 Q. Now, Marty was in charge of the</p> <p>7 analysts, is that right?</p> <p>8 A. And associate.</p> <p>9 Q. So he had both analysts and</p> <p>10 associates?</p> <p>11 A. Yes.</p> <p>12 Q. And do you know why Ms. Bartoletti</p> <p>13 was terminated?</p> <p>14 A. I don't know why. Like she was a</p> <p>15 great manager. She was basically doing,</p> <p>16 performing as Nick when Nick wasn't around,</p> <p>17 so.</p> <p>18 Q. Do you know why Mr. Koessel was</p> <p>19 retained?</p> <p>20 A. I don't know, like I guess the</p> <p>21 only reason is because he's a male.</p> <p>22 Q. So when females were retained in</p> <p>23 earlier rounds, yourself, for example, when</p> <p>24 you were retained and Mr. Chen was let go,</p> <p>25 remember Mr. Chen replaced you on a reduction</p>
<p>206</p> <p>1 C. SIU</p> <p>2 Bartoletti, Mr. High, and while he was there,</p> <p>3 Nick Fluehr, who were doing student loans,</p> <p>4 right?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know whether Citigroup was</p> <p>7 going to continue to do student loans going</p> <p>8 forward after November of 2008?</p> <p>9 A. I don't know, but our main</p> <p>10 business was housing. Like student loans was</p> <p>11 just an additional revenue base for us.</p> <p>12 Q. Do you know why Mr. Murad was let</p> <p>13 go in November of 2008?</p> <p>14 A. Probably because he wanted to</p> <p>15 leave the group.</p> <p>16 Q. Why do you say he wanted to leave</p> <p>17 the group?</p> <p>18 A. He talked to -- I believe he</p> <p>19 talked to Marty stating that he wanted to</p> <p>20 transfer out of the housing group.</p> <p>21 Q. Why do you believe that? Did you</p> <p>22 overhear that conversation?</p> <p>23 A. Yeah. Or I sit right in front of</p> <p>24 Marty so he came out from his office and --</p> <p>25 Q. When was that?</p>	<p>208</p> <p>1 C. SIU</p> <p>2 list? Do you remember that?</p> <p>3 MR. DATOO: Objection.</p> <p>4 Q. Do you remember that?</p> <p>5 A. Yes, I remember that.</p> <p>6 Q. And do you think that you were</p> <p>7 retained at that point because you are a</p> <p>8 woman?</p> <p>9 A. No, it is definitely my</p> <p>10 performance.</p> <p>11 Q. And do you think that Mr. Chen was</p> <p>12 let go at that point because he was a male?</p> <p>13 A. No.</p> <p>14 Q. So are there any males who were</p> <p>15 let go that you believe were let go because of</p> <p>16 their gender?</p> <p>17 A. No.</p> <p>18 Q. Are there any females who were</p> <p>19 retained who you think were retained because</p> <p>20 of their gender?</p> <p>21 A. No. In my group. I don't know</p> <p>22 about other groups.</p> <p>23 Q. So it is your testimony that it is</p> <p>24 only when a female is let go that gender could</p> <p>25 be a reason?</p>



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CHIA SIU

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<p style="text-align: right;">209</p> <p>1 C. SIU</p> <p>2 MR. DATOO: Objection.</p> <p>3 Q. Is that right?</p> <p>4 MR. DATOO: Objection.</p> <p>5 You can answer.</p> <p>6 Q. Is that right?</p> <p>7 A. I couldn't like think of any other</p> <p>8 reason for them to retain less qualified male</p> <p>9 over the female, but in earlier instances they</p> <p>10 were the least qualified one in the group. So</p> <p>11 it makes sense to let them go.</p> <p>12 Q. So Nick Fluehr was the least</p> <p>13 qualified person in the group when he was let</p> <p>14 go?</p> <p>15 A. I meant like the comparable one,</p> <p>16 like the counterparts. But Nick Fluehr didn't</p> <p>17 have a counterpart.</p> <p>18 Q. But they didn't let Ms. Bartoletti</p> <p>19 go at that point, did they?</p> <p>20 A. No.</p> <p>21 Q. Instead they made her a co-head of</p> <p>22 the group after he was let go, right?</p> <p>23 A. Yes, they made her co-head after</p> <p>24 Koessel was, found out about it, about her</p> <p>25 promotion.</p>	<p style="text-align: right;">211</p> <p>1 C. SIU</p> <p>2 Q. Right, but in November of 2008 the</p> <p>3 group was shrinking again, correct?</p> <p>4 A. Yes.</p> <p>5 Q. And did you talk to Mr. Brownstein</p> <p>6 at all about the termination decisions?</p> <p>7 A. For November?</p> <p>8 Q. Yes.</p> <p>9 A. 2008. No, I believe he wasn't</p> <p>10 even around.</p> <p>11 Q. Did you talk to Mr. Chin about</p> <p>12 those decisions?</p> <p>13 A. No, I don't think they were around</p> <p>14 at that time.</p> <p>15 Q. When you say they weren't around?</p> <p>16 A. Like in the office.</p> <p>17 Q. Do you know when Ping was informed</p> <p>18 of her termination?</p> <p>19 A. When? The same time as mine</p> <p>20 term -- like the November.</p> <p>21 Q. Was she told the same day you were</p> <p>22 told?</p> <p>23 A. Yes. It usually occurs on the</p> <p>24 same day.</p> <p>25 Q. And does the same hold true for</p>
<p style="text-align: right;">210</p> <p>1 C. SIU</p> <p>2 Q. Do you think she was given that</p> <p>3 position because of her gender?</p> <p>4 A. No, she gave that position because</p> <p>5 of her experience, like the fact that she's</p> <p>6 been at Citi longer and --</p> <p>7 Q. Could there be, could management</p> <p>8 have had reasons for their termination</p> <p>9 decisions related to you, other than your</p> <p>10 gender?</p> <p>11 MR. DATOO: Objection.</p> <p>12 Q. You can answer.</p> <p>13 A. I don't know why they would let me</p> <p>14 go, especially after they gave me the</p> <p>15 promotion.</p> <p>16 Q. Can you think of any reason other</p> <p>17 than your gender why they would have let you</p> <p>18 go?</p> <p>19 A. No.</p> <p>20 Q. How about the fact that you had</p> <p>21 previously indicated your insecurity with the</p> <p>22 future and the direction of the group, could</p> <p>23 that have been a reason?</p> <p>24 A. Yes, but they already addressed</p> <p>25 that by giving me a promotion.</p>	<p style="text-align: right;">212</p> <p>1 C. SIU</p> <p>2 the other two who were let go, they were told</p> <p>3 the same day as you?</p> <p>4 A. Yes.</p> <p>5 Q. Were you given an offer, a</p> <p>6 severance offer at the time you were told of</p> <p>7 your termination?</p> <p>8 A. Yes. They gave me a packet with I</p> <p>9 guess the severance.</p> <p>10 Q. Do you recall how much you were</p> <p>11 offered in severance pay?</p> <p>12 A. I think it was in the low 10, like</p> <p>13 10, I don't remember. Two months or</p> <p>14 something. I don't remember.</p> <p>15 Q. Did you talk to Mr. Feinstein</p> <p>16 about your termination?</p> <p>17 A. I don't remember. I don't think</p> <p>18 so.</p> <p>19 Q. Other than your meeting with human</p> <p>20 resources, did you talk to anybody about the</p> <p>21 reason for your termination?</p> <p>22 A. No. I was just so shocked, like I</p> <p>23 couldn't have any....</p> <p>24 Q. When you were told about your</p> <p>25 termination from the woman from human</p>



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CHIA SIU

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<p>213</p> <p>1 C. SIU</p> <p>2 resources, did you tell her that you thought</p> <p>3 that this was because of your gender?</p> <p>4 A. No.</p> <p>5 Q. Up until the day of your</p> <p>6 termination, had anything occurred during your</p> <p>7 employment at Citigroup that you felt you were</p> <p>8 treated differently because of your gender?</p> <p>9 A. No.</p> <p>10 Q. And you never complained to anyone</p> <p>11 at CitiGroup about being treated differently</p> <p>12 because of your gender, correct?</p> <p>13 A. No.</p> <p>14 Q. And when you were informed -- you</p> <p>15 were informed in November of 2008. Do you</p> <p>16 recall that you were paid through January 20th</p> <p>17 of 2009?</p> <p>18 A. Yes.</p> <p>19 Q. And that was at your base salary</p> <p>20 late of \$80,000?</p> <p>21 A. I believe so. I don't know if it</p> <p>22 was, should have been the associate's. It was</p> <p>23 supposed to start in January.</p> <p>24 Q. So if you had remained employed,</p> <p>25 you would have become an associate in January?</p>	<p>215</p> <p>1 C. SIU</p> <p>2 Q. Ms. Siu, do you know whether Mr.</p> <p>3 Fluehr got a job after he left Citigroup?</p> <p>4 A. I heard that he -- yeah, he joined</p> <p>5 Bank of America.</p> <p>6 Q. Did you and Mr. Fleuhr continue to</p> <p>7 communicate after he was terminated?</p> <p>8 A. No. I only hear updates about him</p> <p>9 through, like his assistant, yeah, or like</p> <p>10 Amy.</p> <p>11 Q. Did you consider moving to Bank of</p> <p>12 America to join Mr. Fluehr?</p> <p>13 A. No, they never approach me to join</p> <p>14 him.</p> <p>15 Q. You are aware that he, Mr. Fluehr</p> <p>16 took a job with Samuel A. Ramirez, correct?</p> <p>17 A. After Bank of America? Yes.</p> <p>18 Q. Do you know when he started there?</p> <p>19 A. I'm not sure, maybe 2010 I guess.</p> <p>20 Q. And Ms. Bartoletti also went to</p> <p>21 Ramirez to work, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Do you have any idea how that came</p> <p>24 about?</p> <p>25 A. I don't really know, but I would</p>
<p>214</p> <p>1 C. SIU</p> <p>2 A. Yes, that's what they told me.</p> <p>3 Q. And did you ever receive any --</p> <p>4 you said at some point earlier they were</p> <p>5 working on documentation about this promotion.</p> <p>6 Did you ever receive any documentation?</p> <p>7 A. No. Because they say they are</p> <p>8 still working on it.</p> <p>9 Q. And when you say they say, who is</p> <p>10 they?</p> <p>11 A. Amy said that HR is working on it.</p> <p>12 Q. Do you think Amy was being honest</p> <p>13 with you when she said that?</p> <p>14 A. I believed her.</p> <p>15 MR. TURNBULL: Can we take a</p> <p>16 short, just a couple minute break.</p> <p>17 MR. DATOO: Sure. Five minutes?</p> <p>18 THE VIDEOGRAPHER: The time now is</p> <p>19 3:02 p.m. This marks the end of tape</p> <p>20 No. 3. Going off the record.</p> <p>21 (Recess taken.)</p> <p>22 THE VIDEOGRAPHER: The time now is</p> <p>23 3:13 p.m. This marks the beginning of</p> <p>24 tape No. 4. We're back on the record.</p> <p>25 BY MR. TURNBULL:</p>	<p>216</p> <p>1 C. SIU</p> <p>2 assume Nick reached out to her about a</p> <p>3 position at Ramirez.</p> <p>4 Q. Did you talk to Ms. Bartoletti</p> <p>5 about how she came to join Ramirez?</p> <p>6 A. Not really. I think she might</p> <p>7 have -- it was probably through Nick.</p> <p>8 Q. And did you work with Mr. Fluehr</p> <p>9 and Ms. Bartoletti at Ramirez?</p> <p>10 A. I didn't work for them. I work</p> <p>11 with someone else there. It was actually in</p> <p>12 the student loan group.</p> <p>13 Q. And Ms. Bartoletti and Mr. Fluehr</p> <p>14 were not working on student loans at Ramirez?</p> <p>15 A. They weren't involved. Someone</p> <p>16 else was in charge of student loan.</p> <p>17 Q. What were they working on at</p> <p>18 Ramirez?</p> <p>19 A. Probably on housing or anything</p> <p>20 that they could get into accounts because they</p> <p>21 can't limit their option to housing given that</p> <p>22 the housing market has been constricting --</p> <p>23 contracting.</p> <p>24 MR. DATOO: Sorry, Ken, can we</p> <p>25 just take a quick two-minute break.</p>



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